

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both
individually and as Legal Guardian of
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

V.

THE GOODYEAR TIRE & RUBBER
COMPANY,

Defendant.

Case No. 8:18-cv-00127

THE GOODYEAR TIRE & RUBBER COMPANY'S
AMENDED IDENTIFICATION OF EXPERT WITNESSES

The Goodyear Tire & Rubber Company (“Goodyear”), pursuant to Fed. R. Civ. P. 26(a)(2) and the Order Setting Final Schedule for Progression of Case (Doc. #77), identifies the following experts who may be called at trial to testify on behalf of Goodyear:

1. Joseph L. Grant
4201 Moss Creek Court
Matthews, North Carolina 28105

Mr. Grant is an expert in tire design, manufacture, and failure analysis. Mr. Grant is expected to testify to the cause of the disablement in the tire at issue, the design and manufacture of the tire at issue, as well as any alternative designs suggested by plaintiffs or plaintiffs' experts. Mr. Grant's opinions, the subject matter of his testimony, and the basis for his opinions will be provided in a written report pursuant to Fed. R. Civ. P. 26(a)(2) and the Progression Order for this case.

2. Steven J. Fenton, P.E.
Kineticorp
6070 Greenwood Plaza Blvd., Suite 200
Greenwood Village, CO 80111

Mr. Fenton is an expert in accident reconstruction. He is expected to testify to his reconstruction of the accident on May 1, 2015. Mr. Fenton's opinions, the subject matter of his testimony, and the basis for his opinions will be provided in a written report pursuant to Fed. R. Civ. P. 26(a)(2) and the Progression Order for this case.

3. Gray Beauchamp, M.S., P.E.
Kineticorp
6070 Greenwood Plaza Blvd., Suite 200
Greenwood Village, CO 80111

Mr. Beauchamp is an expert in vehicle handling and controllability. He is expected to testify to his analysis of the vehicle handling and controllability aspects of this case. Mr. Beauchamp's opinions, the subject matter of his testimony, and the basis for his opinions will be provided in a written report pursuant to Fed. R. Civ. P. 26(a)(2) and the Progression Order for this case.

4. Elizabeth H. Raphael, M.D.
Delta V Biomechanics
930 Commercial Street
Palo Alto, CA 94303

Dr. Raphael is an expert in emergency medicine, biomechanics, vehicular injury analysis, automotive crashworthiness, occupant kinematics, and computer analysis of human motion. Dr. Raphael is expected to testify to the injuries sustained by plaintiffs and the cause of those injuries. Dr. Raphael's opinions, the subject matter of her testimony, and the basis for his opinions will be provided in a written report pursuant to Fed. R. Civ. P. 26(a)(2) and the Progression Order for this case.

5. Alan H. Weintraub, M.D.
Medical Director Brain Injury Program
Attending Physician
Craig Hospital - CNS Medical Group, P.C.
3425 South Clarkson Street
Englewood, Colorado 80113

Dr. Weintraub specializes in physical medicine and rehabilitation. He is expected to testify to the nature and extent of the injuries sustained by Shane Loveland, including prognosis and future care needs. Dr. Weintraub's opinions, the subject matter of his testimony, and the basis for his opinions will be provided in a written report pursuant to Fed. R. Civ. P. 26(a)(2) and the Progression Order for this case.

6. Cathlin Vinett Mitchell, RN, BSN, CRRN, CM
Care Management Consultants, Inc.
P.O. Box 3101
Brentwood, TN 37027

Ms. Vinett Mitchell is an expert in life care planning. She is expected to testify to the life care planning needs of Shane Loveland. Ms. Vinett Mitchell's opinions, the subject matter of her testimony, and the basis for his opinions will be provided in a written report pursuant to Fed. R. Civ. P. 26(a)(2) and the Progression Order for this case.

7. Ernest Goss
Professor of Economics
Creighton University
Omaha, NE

Mr. Goss is an expert in the field of economics. He is expected to testify to the present cash value of any future wage loss or future medical expenses to Shane Loveland which are established by the evidence. Mr. Goss's opinions, the subject matter of his testimony, and the basis for his opinions will be provided in a written report pursuant to Fed. R. Civ. P. 26(a)(2) and the Progression Order for this case.

8. Michael Kerns, Ph.D.
Senior Manager, America's Compound Development & Materials Science
The Goodyear Tire & Rubber Company
Akron, OH

Mr. Kerns has specialized knowledge regarding tire service life issues, and may be asked to provide testimony regarding the material properties of rubber and how it is affected by time, temperature, exposure to the ozone, and other environmental factors. It is anticipated he will provide testimony relating to the efforts at Goodyear to study tire service life issues, the use of antidegradants in component compound formulas, as well as the company position relating to the contention that tires should be taken out of service based on chronological age alone. It is expected Mr. Kerns will testify that chronological age is not the only variable to consider when evaluating tire life service issues that tires should not be taken out of service based on age alone, and that age alone is not a basis on which to conclude a tire is not safe for use. Mr. Kerns will discuss thermo-oxidative degradation and all factors affecting tire service life.

9. Jay Lawrence
Lawrence Technical Consulting LLC
3969 High Point Drive
Uniontown, OH 44685

Mr. Lawrence is a former employee of The Goodyear Tire & Rubber Company. Mr. Lawrence held various positions within Goodyear from 1976 through his retirement in 2018, including responsibility for design and development of passenger, light truck, military, and agricultural tires. Mr. Lawrence worked for several years as a Chief Tire Analysis Engineer inspecting and analyzing tires involved in claims against Goodyear, and was Manager Product Analysis when he retired in 2018. Mr. Lawrence has knowledge regarding the Load Range E investigation carried out by Goodyear which focused on the identification of the cause(s) to an increase in reported claims of tread separations and detachments on certain Load Range E tires manufactured by Goodyear in the early 1990's. It is anticipated Mr. Lawrence will provide testimony regarding the investigative efforts by Goodyear, and the recommendations and conclusions stemming from the investigation.

Mr. Lawrence is also expected to testify to the National Highway Safety Administration investigation into that same issue, and the outcome of that investigation.

10. Nathan Dorris, Ph.D.
Dorris and Associates International, LLC
1075 Peachtree Street, Suite 3750
Atlanta, GA 30309

Dr. Dorris is a human factors specialist with extensive experience in product safety and the evaluation of warnings, instructions, and other safety-related communications. He will be asked to testify to the human factors and warning issues associated with tires and, specifically, to those subject matters and opinions identified by Lila Laux in her report and deposition.

GREENSFELDER, HEMKER & GALE, P.C.



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CERTIFICATE OF SERVICE

I hereby certify that I have on this 7th day of May, 2019, the foregoing was emailed and mailed to the following counsel of record:

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